

Exhibit 6

Tuesday, May 27, 2014 at 5:10:47 PM Central Daylight Time

Subject: Re: Depo**Date:** Tuesday, May 27, 2014 at 4:52:59 PM Central Daylight Time**From:** Sean Flammer**To:** Coogan, Kim**CC:** jeff@edwards-law.com, Scott Medlock

Kim,

We sent a letter on May 6 asking for your availability and Mr. Shaffer's availability on several days in May, including May 28. UTMB did not directly respond to our request except to say that he filed an affidavit with the court.

Without hearing on your availability, we noticed the deposition on May 14 for May 28's deposition. Although you did not ask for it, we wrote to you that we were willing to reschedule if there was a scheduling issue so long as the deposition could be rescheduled shortly. We suggested doing the UTMB witness on the same day as a TDCJ witness to be more efficient. This morning UTMB has indicated that it will present its IT director but only (1) in Galveston, even though all the lawyers are in Austin, and, more importantly, (2) after June 16. For several hours, we went back and forth and tried to compromise and I told you that we'd go to Galveston. We offered June 2 and June 3. The response has been that he is in training on June 2 and June 3 and cannot be taken out even for a couple of hours and UTMB will not present him until June 16.

We are ready and able to take the deposition tomorrow. We will be there and will take a certificate of nonappearance if he is not there.

Please call with any questions. Thanks,
Sean

From: "Coogan, Kim" <kim.coogan@texasattorneygeneral.gov>**Date:** Tuesday, May 27, 2014 at 4:18 PM**To:** Sean Flammer <sean@edwards-law.com>**Subject:** Depo

Sean,

I just conferred with my client's about the depo of Bob Shaffer on June 3. He is not available.

As I told you, he is in training that the entire week of June 2. I had hoped we could pull him out for a short time on June 2 or 3. However, as he is the Director of the IT Division, he is unable to meet with us for a deposition.

He is on vacation the week of June 9.

Both the training and the vacation have been scheduled for quite some time.

As a result, we ask that you take his depo the week of June 16 in Galveston. It is my understanding that you do not want to have to wait that long.

I will proceed with filing a motion to quash tomorrow's deposition, unless I hear back from you regarding the week of the 16th.

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